

GLAVIN PLLC
2585 Broadway #211
New York, New York 10025
646-693-5505

August 2, 2021

VIA ECF

Honorable Loretta A. Preska
U.S. District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Donziger, 19 Cr. 561 (LAP); [11 Civ. 691 (LAK)]

Dear Judge Preska:

I represent the United States and write in response to the Court's July 26, 2021 order directing counsel to confer and indicate their views, by joint letter, regarding a schedule for sentencing submissions and counsel's availability for sentencing. Dkt. 346 at 245.

The Special Prosecutors propose to file a sentencing submission by August 16, 2021. Mr. Kuby, counsel for defendant Steven Donziger, proposes to file the defense sentencing submission by September 13, 2021. As for a sentencing date, I am scheduled to be in trial beginning on September 13, 2021, so if the Court schedules sentencing for a day in September after the 13th, I would request that the sentencing be on a Friday. Otherwise I am available. Mr. Kuby is available any day after September 13 other than September 20 or 29.

Respectfully submitted,

_____/s/_____
Rita M. Glavin

*Special Prosecutor on behalf
of the United States*